

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	WC Docket No. 09-197
Petition of Cellco Partnership for Pro Forma	)	
Amendment of ETC Designations in the	)	
Commonwealth of Virginia	)	
	)	
	)	

To: The Chief, Wireline Competition Bureau

**PETITION OF CELLCO PARTNERSHIP FOR PRO FORMA AMENDMENT OF ETC  
DESIGNATIONS IN THE COMMONWEALTH OF VIRGINIA**

Cellco Partnership d/b/a Verizon Wireless and its affiliates (hereinafter “Cellco”) hereby request the amendment of the eligible telecommunications carrier (“ETC”) designations held in the name of ALLTEL Communications, Inc., and its affiliated legal entities (“Alltel”) in the Commonwealth of Virginia to reflect Cellco as the designated entity.<sup>1</sup> The pro forma amendment requested herein merely completes, for purposes of the ETC entities, the transaction that the Commission approved last year, whereby Alltel and its affiliates became wholly-owned

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<sup>1</sup> *Federal-State Joint Board on Universal Service, ALLTEL Communications, Inc.*, CC Docket No. 96-45, Order, 19 FCC Rcd 20496 (WCB 2004) (“2004 ALLTEL Order”); *Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum Opinion & Order, 19 FCC Rcd 1563 (2004) (“Virginia Cellular Order”); *High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al., Petitions for Designation as Eligible Telecommunications Carriers*, WC Docket No. 05-337, CC Docket No. 96-45, Order, 23 FCC Rcd 8834 (2008) (“2008 ALLTEL Order”). In 2006, Virginia Cellular, LLC was acquired by WWC License LLC, a wholly-owned indirect subsidiary of Alltel Corporation. These designations are referred to herein collectively as the “Virginia ETC Designations.” Effective December 31, 2007, Alltel, a Delaware corporation, changed its name to Alltel Communications, LLC.

indirect subsidiaries of Cellco.<sup>2</sup> This amendment will allow Cellco to complete the network and customer care integration and provide the full benefits to Virginia consumers contemplated in the merger as approved by the Commission.<sup>3</sup> Cellco does not seek through this amendment to expand the geographic scope of the Virginia ETC Designations, and will seek high cost support consistent with the conditions imposed in the *Cellco-Alltel Order*.<sup>4</sup>

## **I. COMMISSION AUTHORITY OVER THE ETC DESIGNATIONS**

Section 214(e)(2) of the Communications Act of 1934, as amended, gives state commissions the primary responsibility for performing ETC designations.<sup>5</sup> Section 214(e)(6), however, directs the Commission, upon request, to designate as an ETC “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission.”<sup>6</sup> The Virginia Corporation Commission has provided an affirmative statement that it lacks jurisdiction to address ETC designation petitions from wireless carriers.<sup>7</sup> Thus, this Commission has the authority under section 214(e)(6) to determine if Cellco possesses the qualifications to hold an ETC designation in the Commonwealth of Virginia.

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<sup>2</sup> *Applications of Cellco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC for Consent to Transfer Control of Licenses, Authorizations, and Spectrum Manager and de Facto Transfer of Leasing Arrangements*, WT Docket No. 08-95, Memorandum Opinion and Order and Declaratory Ruling, 23 FCC Rcd 17444 (2008) (“*Cellco-Alltel Order*”).

<sup>3</sup> *See id.*

<sup>4</sup> *Id.* at 17532 ¶ 197.

<sup>5</sup> 47 U.S.C. § 214(e)(2); *see Promoting Deployment and Subscriberhip in Unserved Areas, Including Tribal and Insular Areas*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12255, ¶ 93 (2000) (“*Twelfth Report and Order*”).

<sup>6</sup> 47 U.S.C. § 214(e)(6).

<sup>7</sup> *See* Attachment 2.

## II. ELIGIBILITY REQUIREMENTS FOR ETC DESIGNATION

Cellco meets all of the eligibility requirements for designation as an ETC.<sup>8</sup> As demonstrated by the attached certification,<sup>9</sup> Cellco will (1) offer the services designated for support by the Commission pursuant to section 254(c) of the Act; (2) offer the supported services using its own facilities; and (3) advertise the availability of the supported services and associated charges using media of general distribution. Cellco proposes to have the exact same ETC service area that Alltel possesses today.<sup>10</sup>

## III. PUBLIC INTEREST ANALYSIS

In designating Alltel as an ETC, the Commission specifically concluded that Alltel's ETC designations would serve the public interest.<sup>11</sup> Cellco will abide by all of the public interest commitments that Alltel made in connection with its Virginia ETC Designations. In particular, Cellco will continue to comply with the CTIA Consumer Code and will provide annual reports on its progress towards meeting network improvement objectives.<sup>12</sup>

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<sup>8</sup> See 47 C.F.R. §§ 54.201-54.202; *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, CC Docket No. 96-45, Public Notice, 12 FCC Rcd 22947, 22948-49 (1997) ("Section 214(e)(6) Public Notice").

<sup>9</sup> See Attachment 1.

<sup>10</sup> The ILEC wire centers included in Alltel's ETC service area are listed in charts attached to the Virginia ETC Designations, and reproduced as Attachment 3 hereto. On June 8, 2009, the Commission accepted the relinquishment of Virginia Cellular's ETC designation in the Williamsville wire center in Virginia; that wire center is, therefore, omitted from the Attachment. See *Federal-State Joint Board on Universal Service, Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, Order, 24 FCC Rcd 7733 (WCB 2009).

<sup>11</sup> 2004 ALLTEL Order, 19 FCC Rcd at 20502-03 ¶ 15; *Virginia Cellular Order*, 19 FCC Rcd at 1574 ¶ 26; 2008 ALLTEL Order, 23 FCC Rcd at 8862 ¶ 15.

<sup>12</sup> See 2004 ALLTEL Order, 19 FCC Rcd at 20502-03 ¶ 15; *Virginia Cellular Order*, 19 FCC Rcd at 1575 ¶¶ 27-28; 2008 ALLTEL Order, 23 FCC Rcd at 8862 ¶ 14. See also 47 C.F.R. § 54.209(a).

In addition, the Commission concluded that Cellco's acquisition of the Alltel entities would "result in transaction-specific public interest benefits,"<sup>13</sup> including increased wireless footprint and network coverage; expanded and improved services and features, particularly in rural areas; expanded roll-out of broadband and next-generation services; improvements in service quality; efficiencies and economies of scale and scope; and strengthened competition.<sup>14</sup> The Commission noted Cellco's commitments to "expeditiously integrate" Alltel's CDMA voice network into the Verizon Wireless network, which would provide concrete benefits to Alltel customers, particularly in rural areas.<sup>15</sup> The requested amendment of Alltel's ETC designations will facilitate and expedite this network integration by allowing unified booking and reporting of customer account and network expenditure information for competitive ETC purposes, even as the network integration proceeds.

Cellco does not seek through this amendment to expand the geographic scope of the ETC designated areas, and it seeks competitive ETC high-cost support consistent with the conditions imposed in the *Cellco-Alltel Order*.<sup>16</sup>

This amendment necessitates no redefinition of any rural telephone company study areas. As noted above, Cellco will have the same ETC designated area as Alltel; thus, to the extent that

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<sup>13</sup> *Cellco-Alltel Order*, 23 FCC Rcd at 17515 ¶ 156.

<sup>14</sup> *Id.* at 17498-515 ¶¶ 122-156.

<sup>15</sup> *Id.* at 17500-01 ¶¶ 124-125.

<sup>16</sup> *Cellco-Alltel Order*, 23 FCC Rcd at 17532 ¶ 197. As a further condition of the merger, Cellco was required to divest certain properties, including properties in Virginia. *See id.* at 17551-53, App. B. The merger condition regarding high cost universal service support does not, however, apply to those properties. *Id.* at 17531-32 ¶¶ 196-97 (high cost support condition applies to "properties which Verizon Wireless retains"). The amended designation Cellco seeks here does not subject the divestiture properties to the merger condition and does not affect the administration of high cost support funding with respect to the study areas codes assigned to the divestiture properties.

this service area includes any partial rural telephone company study areas, these study areas have been redefined previously for Alltel or other ETCs.<sup>17</sup>

For all these reasons, the requested amendment of Alltel's Virginia ETC Designations to reflect Cellco as the designated entity will serve the public interest.

#### **IV. REGULATORY OVERSIGHT**

Cellco certifies, as required by section 254(e) of the Act, to use high-cost support "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."<sup>18</sup> Cellco acknowledges that it must, under sections 54.313 and 54.314 of the Commission's rules, certify annually that it is in compliance with this requirement. Cellco further commits that it will provide annual reports on its progress towards meeting network improvement objectives,<sup>19</sup> and comply with any other regulatory requirements imposed in the Virginia ETC Designations or applying generally to Commission-designated competitive ETCs.

#### **V. ANTI-DRUG ABUSE CERTIFICATION**

Cellco certifies that no party to this petition is subject to a denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, and Sections 1.2001-1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003.

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<sup>17</sup> See, e.g., 2008 ALLTEL Order, 23 FCC Rcd at 8843-8848 ¶¶ 19, 24, 31 & n.54.

<sup>18</sup> See 47 U.S.C. § 254(e). See also Attachment 1.

<sup>19</sup> See 2004 ALLTEL Order, 19 FCC Rcd at 20502-03 ¶ 15. See also 47 C.F.R. § 54.209(a).

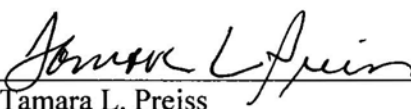
## CONCLUSION

This pro forma amendment petition is consistent with the merger already approved in the *Cellco-Alltel Order* and is requested to facilitate the network integration contemplated therein.

The request is pro forma in nature and should be granted expeditiously.

Respectfully submitted,

**CELLCO PARTNERSHIP AND ITS AFFILIATES**

By:   
Tamara L. Preiss  
Counsel, Regulatory Law Group  
Verizon Wireless  
1300 I Street, NW, Suite 400 West  
Washington, DC 20005  
(202) 589-3770

December 3, 2009

**DECLARATION OF MARK R. SMITH**

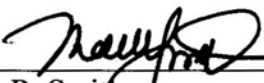
I, Mark R. Smith, do hereby declare under penalty of perjury that:

1. I am Executive Director - Finance for Cellco Partnership d/b/a Verizon Wireless and its affiliates (Cellco).
2. I have reviewed the foregoing Pro Forma Petition of Cellco Partnership for Amendment of ETC Designations in the Commonwealth of Virginia ("Petition") and certify that the facts stated therein are true and correct to the best of my personal knowledge, information, and belief.
3. Cellco currently offers and is able to provide, within its proposed designated service areas, the functionalities identified in 47 C.F.R. § 54.101(a):
  - a. voice grade access to the public switched telephone network;
  - b. local usage;
  - c. dual tone multi-frequency ("DTMF") signaling or its functional equivalent;
  - d. single-party service or its functional equivalent;
  - e. access to emergency services;
  - f. access to operator services;
  - g. access to interexchange service;
  - h. access to directory assistance; and
  - i. toll limitation for qualifying low-income consumers.<sup>1</sup>
4. Cellco will provide the supported services using its own network infrastructure.
5. Cellco will advertise the availability of its universal service offerings and the corresponding rates for those services using media of general distribution throughout the designated service areas.
6. Cellco will use all of the high-cost universal service support received only for the provision, maintenance, and upgrading of services and facilities for which the support is intended.
7. No party to this application is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862 and Sections 1.2001-1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003.

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<sup>1</sup> The company's Lifeline plan provides the functional equivalent of toll limitation because it offers Lifeline customers the ability to terminate calls anywhere in the nation without incurring toll charges.

The foregoing is true, complete, and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Mark R. Smith  
Executive Director - Finance

Dated: 12/1/09



ATTACHMENT 2

(Virginia Corporation Commission Order  
Regarding ETC Jurisdiction)

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION DOCUMENT CONTROL  
AT RICHMOND, APRIL 9, 2004

IN RE:

2004 APR -9 A 11:46

APPLICATION OF VIRGINIA CELLULAR LLC

CASE NO. PUC-2001-00263

For designation as an eligible  
telecommunications provider under  
47 U.S.C. § 214(e) (2)

ORDER INVITING COMMENTS AND/OR REQUESTS FOR HEARING

On December 21, 2001, Virginia Cellular LLC ("Virginia Cellular") filed an application with the State Corporation Commission ("Commission") for designation as an eligible telecommunications carrier ("ETC"). This was the first application by a Commercial Mobile Radio Service ("CMRS") carrier for ETC designation.<sup>1</sup> Pursuant to the Order Requesting Comments, Objections, or Requests for Hearing, issued by the Commission on January 24, 2002, the Virginia Telecommunications Industry Association and NTELOS Telephone Inc. ("NTELOS") filed their respective comments and requests for hearing on February 20, 2002. Virginia Cellular filed Reply Comments on March 6, 2002. Our Order of April 9, 2002, found that § 214(e)(6) of the Act is applicable to Virginia Cellular's application because this Commission has not asserted jurisdiction over CMRS carriers and that Virginia Cellular should apply to the Federal Communications Commission ("FCC") for ETC designation.

Virginia Cellular filed its Petition for Designation as an Eligible Telecommunications Carrier in the State of Virginia with the FCC on April 26, 2002. On January 22, 2004, the FCC released its order designating Virginia Cellular as an ETC in specific portions of its licensed

<sup>1</sup> Virginia Cellular is a CMRS carrier as defined in 47 U.S.C. § 153(27) and is authorized as the "A-band" cellular carrier for the Virginia Rural Service Area, serving the counties of Rockingham, Augusta, Nelson, and Highland and the cities of Harrisonburg, Staunton, and Waynesboro.

service area in the Commonwealth of Virginia subject to certain conditions ("FCC's January 22, 2004, Order").<sup>2</sup>

The FCC's January 22, 2004, Order further stated that Virginia Cellular's request to redefine the service areas of Shenandoah Telephone Company ("Shentel") and MGW Telephone Company ("MGW") in Virginia pursuant to § 214(3)(5) of the Telecommunications Act of 1996 ("Act") was granted subject to the agreement of this Commission. On March 2, 2004, the FCC filed its January 22, 2004, Order as a petition in this case.<sup>3</sup>

Section 214(e)(5) of the Act states:

**SERVICE AREA DEFINED.** - The term "service area" means a geographic area established by a State commission (or the Commission under paragraph (6)) for the purpose of determining universal service obligations and support mechanisms. In the case of an area served by a rural telephone company, "service area" means such company's "study area" unless and until the Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c), establish a different definition of service area for such company.

In this instance, the FCC has determined that the service areas of Shentel and MGW, which are both rural telephone companies under the Act, should be redefined as requested by Virginia Cellular.<sup>4</sup> The FCC further recognizes that the "Virginia Commission's first-hand knowledge of the rural areas in question uniquely qualifies it to determine the redefinition proposal and examine whether it should be approved."<sup>5</sup>

<sup>2</sup> CC Docket No. 96-45, *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*.

<sup>3</sup> See paragraph 45 of the FCC's January 22, 2004, Order. The FCC, in accordance with § 54.207(d) of its rules, requests that the Virginia Commission treat this Order as a petition to redefine a service area under § 54.207(d)(1) of the FCC's rules. A copy of the petition can be obtained from the Commission's website at: <http://www.fcc.state.va.us/scc/caseinfo.htm>.

<sup>4</sup> The FCC denied Virginia Cellular's request to redefine the study area of NTELOS. See paragraph 50 of the FCC's January 22, 2004, Order.

<sup>5</sup> The FCC's January 24, 2004, Order at paragraph 2. (citations omitted)

The Commission finds that interested parties should be afforded the opportunity to *comment and/or request a hearing regarding the FCC's petition to redefine the service areas of Shentel and MGW.* We note that the FCC believes that its proposed redefinition of these service areas should not harm either Shentel or MGW.<sup>6</sup> However, we request any interested party to specifically address in its comments whether our agreeing to the FCC's proposal to redefine the service areas of Shentel and MGW would harm these companies.

NOW UPON CONSIDERATION of all the pleadings of record and the applicable law, the Commission is of the opinion that interested parties should be allowed to comment or request a hearing regarding the FCC's proposed redefinition of Shentel's and MGW's service areas.

Accordingly, IT IS ORDERED THAT:

(1) Any interested party desiring to comment regarding the redefinition of Shentel's and MGW's service areas may do so by directing such comments in writing on or before May 7, 2004, to Joel H. Peck, Clerk of the State Corporation Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218. Interested parties desiring to submit comments electronically may do so by following the instructions found on the Commission's website: <http://www.state.va.us/scc/caseinfo.htm>.

(2) On or before May 7, 2004, any interested party wishing to request a hearing regarding the redefinition of Shentel's and MGW's service areas shall file an original and fifteen (15) copies of its request for hearing in writing with the Clerk of the Commission at the address set forth above. Written requests for hearing shall refer to Case No. PUC-2001-00263 and shall include: (i) a precise statement of the interest of the filing party; (ii) a statement of the specific action sought to the extent then known; (iii) a statement of the legal basis for such action; and (iv) a precise statement why a hearing should be conducted in the matter.

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<sup>6</sup> See paragraphs 43 and 44 of the FCC's January 22, 2004, Order.

(3) On or before June 1, 2004, interested parties may file with the Clerk of the Commission an original and fifteen (15) copies of any responses to the comments and requests for hearing filed with the Commission. A copy of the response shall be delivered to any person who filed comments or requests for hearing.

(4) This matter is continued generally.

AN ATTESTED COPY hereof shall be sent by the Clerk of the Commission to: each local exchange telephone company licensed to do business in Virginia, as shown on Attachment A hereto; David A. LaFuria, Esquire, Lukas, Nace, Gutierrez & Sachs, Chartered, 1111 19th Street, N.W., Suite 1200, Washington, D.C. 20036; Thomas Buckley, Attorney-Advisor, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, D.C. 20554; Virginia Telecommunications Industry Association, c/o Richard D. Gary, Esquire, Hunton & Williams LLP, Riverfront Plaza, East Tower, 951 East Byrd Street, Richmond, Virginia 23219-4074; L. Ronald Smith, President and General Manager, Shenandoah Telephone Company, P.O. Box 105, Williamsville, Virginia 24487; Lori Warren, Director of Regulatory Affairs, MGW Telephone Company, P.O. Box 459, Edinburg, Virginia 22824-0459; C. Meade Browder, Jr., Senior Assistant Attorney General, Division of Consumer Counsel, Office of Attorney General, 900 East Main Street, 2nd Floor, Richmond, Virginia 23219; and the Commission's Office of General Counsel and Divisions of Communications, Public Utility Accounting, and Economics and Finance.

## ATTACHMENT 3

(Wire Center List)

### Attachment 3

### Virginia ETC Designations Study Areas/Wire Centers<sup>1</sup>

LEC NAME	WIRE CENTER	CLLI CODE
Buggs Island Telephone Coop.	LA CROSSE	BCRGVAXA
Buggs Island Telephone Coop.	BAKERVILLE	BCWDVAXA
Burkes Garden Telephone Co. Inc.	BURKES GARDEN	BRGRVAXA
New Hope Telephone Co.	FT DEFIANCE	NWHPVAXA
Peoples Mutual Telephone Co.	GRETNA	GRETVAXA
Peoples Mutual Telephone Co.	HURT	HURTVAXA
Peoples Mutual Telephone Co.	RENAN	RENNVAXA
Peoples Mutual Telephone Co.	SANDY LEVEL	SNLTVAXA
Scott County Telephone Coop.	CLINCHPORT	CLPTVAXA
Scott County Telephone Coop.	DUFFIELD	DFFDVAXA
Scott County Telephone Coop.	DUNGANNON	DNGNVAXA
Scott County Telephone Coop.	FORT BLACKMORE	FTBCVAXA
Scott County Telephone Coop.	NICKELSVILLE	NCVLVAXA
Scott County Telephone Coop.	WILLIAMS MILL	WLMLVAXA
Bell Atlantic (Verizon)	Staunton	(STDRVASD)
Bell Atlantic (Verizon)	Staunton	(STTNVAST)
Bell Atlantic (Verizon)	Staunton	(STTNVAVE)
Bell Atlantic (Verizon)	Craigsville	
Bell Atlantic (Verizon)	Lovingston	(NLFRVANF)
Bell Atlantic (Verizon)	Lovingston	(LVTNVALN)
Bell Atlantic (Verizon)	Lovingston	(WNTRVAWG)
Bell Atlantic (Verizon)	Greenwood	
Bell Atlantic (Verizon)	Pine River	
GTE South, Inc. (Verizon)	Broadway	
GTE South, Inc. (Verizon)	Edom	
GTE South, Inc. (Verizon)	Hinton	
GTE South, Inc. (Verizon)	Dayton	
GTE South, Inc. (Verizon)	Keezletown	
GTE South, Inc. (Verizon)	Harrisonburg	
GTE South, Inc. (Verizon)	McGaheysville	
GTE South, Inc. (Verizon)	Bridgewater	
GTE South, Inc. (Verizon)	Weyerscave	
GTE South, Inc. (Verizon)	Grottoes	
GTE South, Inc. (Verizon)	Elkton	
GTE South, Inc. (Verizon)	Amherst	
GTE South, Inc. (Verizon)	Gladstone	
New Hope Telephone Company		
North River Telephone Company		
Highland Telephone Cooperative		
Shenandoah Telephone Company	Bergton	
MGW Telephone Company	McDowell	

<sup>1</sup> Wire center name or CLLI code information that is omitted here was not provided in relevant ETC designation order.

LEC NAME	WIRE CENTER	CLLI CODE
MGW Telephone Company	Deerfield	
VERIZON S VA (CONTEL)		ALBRVAXA
VERIZON S VA (CONTEL)		AMHRVAXA
VERIZON S VA (CONTEL)		APMTVAXA
VERIZON S VA (CONTEL)		BMNVAXA
VERIZON S VA (CONTEL)		BYKNVAXA
VERIZON S VA (CONTEL)		CPRNVAXA
VERIZON S VA (CONTEL)		CRTDVAXA
VERIZON S VA (CONTEL)		CSCYVAXA
VERIZON S VA (CONTEL)		HCKRVAXA
VERIZON S VA (CONTEL)		GRBRVAXA
VERIZON S VA (CONTEL)		CLVLVAXA
VERIZON S VA (CONTEL)		CRLDVAXA
VERIZON S VA (CONTEL)		DNDRVAXA
VERIZON S VA (CONTEL)		DSPAVAXA
VERIZON S VA (CONTEL)		DSWLVAXA
VERIZON S VA (CONTEL)		EMPRVAXA
VERIZON S VA (CONTEL)		EPFKVAXA
VERIZON S VA (CONTEL)		FKLNVAXB
VERIZON S VA (CONTEL)		GLDSVAXA
VERIZON S VA (CONTEL)		GLCSVAXA
VERIZON S VA (CONTEL)		GRBRVAXB
VERIZON S VA (CONTEL)		SBWKVAXA
VERIZON S VA (CONTEL)		HNVRVAXA
VERIZON S VA (CONTEL)		HAYSVAXA
VERIZON S VA (CONTEL)		IVORVAXA
VERIZON S VA (CONTEL)		JRRNAXA
VERIZON S VA (CONTEL)		LRVLVAXA
VERIZON S VA (CONTEL)		OLCHVAXA
VERIZON S VA (CONTEL)		ALWDVAXA
VERIZON S VA (CONTEL)		SMFDVAXA
VERIZON S VA (CONTEL)		CLMTVAXA
VERIZON S VA (CONTEL)		STCKVAXA
VERIZON S VA (CONTEL)		HLLDVAXA
VERIZON S VA (CONTEL)		CHKTVAXA
VERIZON S VA (CONTEL)		SRRWAXA
VERIZON S VA (CONTEL)		PRANVAXB
VERIZON S VA (CONTEL)		PUNGVAXA
VERIZON S VA (CONTEL)		PRANVAXA
VERIZON S VA (CONTEL)		WKFDVAXA
VERIZON S VA (CONTEL)		WNDSVAXA
VERIZON VA, INC.		APLCVAAP
VERIZON VA, INC.		PNRWAPR
VERIZON VA, INC.		ASLDVAAS
VERIZON VA, INC.		BDFRVABD
VERIZON VA, INC.		BTHIVABT
VERIZON VA, INC.		BGISVABI
VERIZON VA, INC.		BSGPVABG



LEC NAME	WIRE CENTER	CLLI CODE
VERIZON VA, INC.		DCVLVADV
VERIZON VA, INC.		CHCYVACC
VERIZON VA, INC.		CHHMVACH
VERIZON VA, INC.		CHSKVACD
VERIZON VA, INC.		CHSKVAGU
VERIZON VA, INC.		CHSKVADC
VERIZON VA, INC.		CHESVACR
VERIZON VA, INC.		WHOKVAWO
VERIZON VA, INC.		CLWDVACW
VERIZON VA, INC.		CLNCVACL
VERIZON VA, INC.		CLVRVACL
VERIZON VA, INC.		COBNVACB
VERIZON VA, INC.		CLHGVACO
VERIZON VA, INC.		CNCRVACN
VERIZON VA, INC.		CGVLVACL
VERIZON VA, INC.		CLPPVARV
VERIZON VA, INC.		CLPPVACU
VERIZON VA, INC.		CLPPVAGR
VERIZON VA, INC.		DANNVADA
VERIZON VA, INC.		DAVLVAFP
VERIZON VA, INC.		DVPNADP
VERIZON VA, INC.		DNWDVADW
VERIZON VA, INC.		FIFEVAFI
VERIZON VA, INC.		GCLDVAGO
VERIZON VA, INC.		GNWDVAGW
VERIZON VA, INC.		HMPNVAWD
VERIZON VA, INC.		HMPNVAQN
VERIZON VA, INC.		HMPNVADC
VERIZON VA, INC.		HMPNVAAB
VERIZON VA, INC.		HYSIVAHY
VERIZON VA, INC.		HNKRVAHK
VERIZON VA, INC.		HPWLVAHW
VERIZON VA, INC.		JNVLVAJV
VERIZON VA, INC.		LBNNVALB
VERIZON VA, INC.		SWCKVASC
VERIZON VA, INC.		CLPPVALI
VERIZON VA, INC.		LVTNVALN
VERIZON VA, INC.		LYBGVACV
VERIZON VA, INC.		LYBGVAYB
VERIZON VA, INC.		LYBGVANL
VERIZON VA, INC.		LYBGVATM
VERIZON VA, INC.		LYBGVAOF
VERIZON VA, INC.		LYBGVACH
VERIZON VA, INC.		LYBGVAMH
VERIZON VA, INC.		MDSNVAMA
VERIZON VA, INC.		MNKNVAMN
VERIZON VA, INC.		MCKWAMK
VERIZON VA, INC.		MCHWAMV

LEC NAME	WIRE CENTER	CLLI CODE
VERIZON VA, INC.		MDLNAMD
VERIZON VA, INC.		NLFRVANF
VERIZON VA, INC.		NWNWVAJF
VERIZON VA, INC.		NWNWVAHU
VERIZON VA, INC.		NWNWVAYK
VERIZON VA, INC.		NWNWVAHV
VERIZON VA, INC.		NWNWVAND
VERIZON VA, INC.		NRFLVAGS
VERIZON VA, INC.		NRFLVAWC
VERIZON VA, INC.		NRFLVABS
VERIZON VA, INC.		NRFLVASP
VERIZON VA, INC.		NRFLVABL
VERIZON VA, INC.		NRFLVAOD
VERIZON VA, INC.		NRFLVAOV
VERIZON VA, INC.		NRTNVANO
VERIZON VA, INC.		PNGPVAPG
VERIZON VA, INC.		PONDVAPO
VERIZON VA, INC.		PTBGVACD
VERIZON VA, INC.		PTBGVAPB
VERIZON VA, INC.		PTMOVAHS
VERIZON VA, INC.		PTMOVAHF
VERIZON VA, INC.		PWHNAPW
VERIZON VA, INC.		PRFRVAPF
VERIZON VA, INC.		QNTNVAQN
VERIZON VA, INC.		VARNVAVR
VERIZON VA, INC.		RCMDVACG
VERIZON VA, INC.		RCMDVAIT
VERIZON VA, INC.		RCMDVALS
VERIZON VA, INC.		RCMDVAHL
VERIZON VA, INC.		RCMDVAGK
VERIZON VA, INC.		RCMDVAPS
VERIZON VA, INC.		RCMDVASR
VERIZON VA, INC.		RCMDVAGY
VERIZON VA, INC.		RCMDVAGR
VERIZON VA, INC.		RCMDVARA
VERIZON VA, INC.		RCMDVAPE
VERIZON VA, INC.		RCMDVAHS
VERIZON VA, INC.		RCMDVASN
VERIZON VA, INC.		RCMDVAHR
VERIZON VA, INC.		RCMDVATC
VERIZON VA, INC.		RNGLVARG
VERIZON VA, INC.		RKVLVARK
VERIZON VA, INC.		RSHLVALE
VERIZON VA, INC.		LBNNVARD
VERIZON VA, INC.		SNTNVASS
VERIZON VA, INC.		STCHVASC
VERIZON VA, INC.		STPLVASP
VERIZON VA, INC.		SNMTVASM

LEC NAME	WIRE CENTER	CLLI CODE
VERIZON VA, INC.		DRVVRVADR
VERIZON VA, INC.		SFFLVASK
VERIZON VA, INC.		WHVLVAWH
VERIZON VA, INC.		TOANVATO
VERIZON VA, INC.		VRBHVAIR
VERIZON VA, INC.		VRBHVAIL
VERIZON VA, INC.		VRBHVASR
VERIZON VA, INC.		VRBHVACC
VERIZON VA, INC.		VRBHVAPT
VERIZON VA, INC.		VRBHVARC
VERIZON VA, INC.		VRBHVAVB
VERIZON VA, INC.		SWVLVASV
VERIZON VA, INC.		VRBHVACT
VERIZON VA, INC.		VRBHVAGN
VERIZON VA, INC.		WVRLVAWV
VERIZON VA, INC.		WLBGVAWM
VERIZON VA, INC.		WNTRVAWG
VERIZON VA, INC.		WISEVAWI